![Kim & Serritella LLP logo]

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October 28, 2022

VIA ECF AND EMAIL

Hon. Katherine Polk Failla, U.S. District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2103
New York, NY 10007
Failla_NYSDChambers@nysd.uscourts.gov

MEMO ENDORSED

Re: *Risley v. Universal Navigation Inc., et al.*, Case No. 1:22-cv-02780-KPF

Dear Judge Failla:

In accordance with Rule 2.D. of the Court's Individual Rules of Practice in Civil Cases, we write respectfully on behalf of Plaintiffs to request (i) permission to submit an omnibus 5-page response to Defendants' respective pre-motion letters (ECF Nos. 52, 54, 56) and (ii) a brief adjournment of Plaintiffs' deadline to respond from Monday, October 31, 2022 to Friday, November 4, 2022.

It would be in the interest of efficiency and judicial economy for the Court to have a consolidated 5-page letter from Plaintiffs instead of three separate 3-page letters. In addition, Plaintiffs seek a brief extension given that some of Plaintiffs' counsel, including myself, are unexpectedly traveling this week and the additional time would assist Plaintiffs in streamlining their response to the multiple letters.

There has been no previous request for an extension of this deadline and Defendants consent to this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ James R. Serritella

James R. Serritella

cc: All Counsel of Record

Application GRANTED. Plaintiff's deadline to respond to Defendants' respective pre-motion letters (Dkt. #52, 54, 56) is hereby adjourned to **November 4, 2022.** Furthermore, Plaintiff may file a single, five-page, omnibus response to Defendants' letters rather than responding to each individually.

A pre-motion conference is hereby scheduled for **November 9, 2022 at 10:30 a.m.**

Dated   October 28, 2022   SO ORDERED.
            New York, New York

                                      HON. KATHERINE POLK FAILLA
                                      UNITED STATES DISTRICT JUDGE